

1 Mai Lan G. Rodgers, Attorney (Bar No. VA 91024)
2 Pension Benefit Guaranty Corporation
3 Office of the General Counsel
4 445 12th Street, S.W.
5 Washington, D.C. 20024
6 Phone: (202) 229-3946
7 Emails: Rodgers.MaiLan@pbgc.gov and
8 efile@pbgc.gov

9 Attorney for Pension Benefit Guaranty Corporation

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

9 In re: : CASE NO: 23-30662-HLB
10 :
11 INTERNATIONAL LONGSHORE : Chapter 11
12 AND WAREHOUSE UNION, :
13 Debtor. :
14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

NOTICE OF APPEARANCE AND REQUEST FOR ELECTRONIC NOTICE
BY THE PENSION BENEFIT GUARANTY CORPORATION

15 PLEASE TAKE NOTICE that the Pension Benefit Guaranty Corporation (“PBGC”), a
16 wholly-owned United States Government Corporation under 29 U.S.C. § 1302, an agency of the
17 United States Government under 28 U.S.C. § 451 and 11 U.S.C. § 101(27), and a creditor under 11
18 U.S.C. § 101(10) in the above-captioned case, hereby files this Notice of Appearance pursuant to
19 Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Civil L.R.
20 11-2, and requests, pursuant to Section 1109(b) of Title 11, United States Code and Bankruptcy
21 Rules 2002(j)(4), 3017(d) and 9007, that notice of all matters which may come before the Court
22 concerning the above-captioned case and debtor be given to and served upon PBGC at the two e-
23 mail addresses listed below.

This request includes, *inter alia*, the notices and papers referred to in Bankruptcy Rules 2002, 3017 (including all disclosure statements and plans of reorganization) and 9007, notices of any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or requests, and any other documents brought before this Court in this case, whether formal or informal, *ex parte* or on notice, written or oral, or transmitted or conveyed by mail, electronic mail, personal delivery, telephone or facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that this entry of appearance and request notice is without prejudice to PBGC's rights, remedies and claims against other entities or any objection that may be made to the jurisdiction or venue of the Court or venue of this case, and shall not be deemed or construed to be a waiver of PBGC's rights: (i) to have final orders and non-core matters entered only after *de novo* review by a district court, (ii) to trial by jury in any proceedings so triable in this case or in any controversy or proceeding related to this case, (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert any other rights, claims, actions, defenses, setoffs or recoupments to which PBGC is or may be entitled in law or in equity, all of which PBGC expressly reserves.

DATED: October 17, 2022
Washington, D.C.

Respectfully submitted,

/s/ Mai Lan G. Rodgers
Mai Lan G. Rodgers (Bar No. VA 91024)
Attorney
Pension Benefit Guaranty Corporation
Office of the General Counsel
445 12th Street, S.W.
Washington, D.C. 20024
Phone: (202) 229-3946
Emails: Rodgers.MaiLan@pbgc.gov and
efile@pbgc.gov

CERTIFICATE OF SERVICE

This is to certify that a copy of the Pension Benefit Guaranty Corporation's Notice of Appearance and Request for Electronic Notice was served on October 17, 2023 to the parties listed below:

Debtors' Counsel via CM/ECF

Debra I. Grassgreen
Pachulski Stang Ziehl & Jones LLP
One Sansome Street, 34th Floor, Suite 3430
San Francisco, CA 94104-4436

Trustee via CM/ECF

Mark M. Sharf
6080 Center Dr., #600
Los Angeles, CA 90045

Counsel for U.S. Trustee via CM/ECF

Office of the United States Trustee
Jared A. Day
300 Booth St. #3009
Reno, NV 89509

Christina Lauren Goebelsmann
Department of Justice
450 Golden Gate Ave.
5th Floor
Ste 05-0153
San Francisco, CA 94102

Phillip John Shine
DOJ-Ust
280 South First St.
Suite 268
San Jose, CA 95113

/s/ Mai Lan G. Rodgers
Mai Lan G. Rodgers